

Summit Media Broadcasting, LLC

180 Main Street
Sutton, WV 26601

Phone 1-304-765-7373

WDBS 97.1 FM

WSGB 1490 AM

Fax 1-304-765-7836

Email: info@theboss97fm.com

January 5, 2004

RE: MM Docket No. 99-325

Comments on Separate Antennas for IBOC

Summit Media Broadcasting, LLC, licensee of WDBS a class B FM station covering rural central West Virginia supports implementation of a separate IBOC antenna and transmitter system to promote the growth of IBOC digital transmission to rural areas. WDBS recently upgraded from a class B1 to class B. We built a new ERI tower, purchased a new 4 bay ERI antenna and new Energy-Onix Eco-22 transmitter. This recent large investment in late 2001 for our upgrade was in the midst of initial IBOC decisions. Small companies with our limited growth potential in a rural area will find it difficult to justify the hefty expense of implementing a combiner system for analog and digital transmission.

WDBS presently has the ability to mount a digital antenna on it's tower, just below it's analog antenna and house a separate digital transmitter in it's transmitter building. We understand that the cost to do this is considerably less than a combiner system.

I'm sure many FCC field agents can tell you that a vast majority of FM radio stations in rural America are still on the air today using old tube transmitters and antenna systems that would have to be totally replaced just to make the upgrade to IBOC digital using a combiner system. Additionally studios, audio processors and STL systems have to be upgraded to digital as well. The cost of such a venture in rural America is unaffordable. We too want to implement improvements, but small stations need the FCC to make it as feasible as possible for us to survive with our limited income. We therefore encourage the FCC to adopt this separate antenna system for IBOC so that smaller companies in rural areas will have a better opportunity to afford this upgrade.

Sincerely,

Nunzio A. Sergi - Managing Member
Summit Media Broadcasting, LLC